

34. (Newly Added) The press block as recited in claim 20, wherein said openings are arranged in a plurality of rows and columns in said base.

35. (Newly Added) The method as recited in claim 29, wherein the opening forming step includes the step of arranging said openings in a plurality of rows and columns in said base.

36. (Newly Added) The press block as recited in claim 24, wherein said openings taper towards said open area. - -

#### REMARKS

The Office action rejected claims under 35 U.S.C. §§ 102, 103 and 112, and withdrew claims from consideration. Applicant cancelled claims 25-28; amended claims 13, 20 and 29; and added new claims 33-36. Claims 13-24 and 29-36 remain. Applicant requests that the Examiner reconsider and withdraw the rejections. A Petition for a one month extension of time and a copy of the executed Declaration accompany this Reply as separate papers.

#### Declaration

A copy of the executed Declaration accompanies this Reply as a separate paper. The Declaration provided with the original paperwork was unsigned.

#### Election of Species

The Office action rescinded the restriction requirement, continued to assert the

election of species requirement, and withdrew claims 25-28 from consideration.

Applicant cancelled claims 25-28, directed to the non-elected species.

Applicant thanks the Examiner for considering claims 13-24 on the merits, even though the Office action stated that claims 13-19 and 20-24 were drawn to distinct inventions. Although the point is moot (since no serious burden existed), Applicant does not believe these sets of claims are subcombinations disclosed as usable together.

Rather, Applicant believes these claims should be considered as defining the same essential characteristics of a single embodiment. The two sets of claims define a single embodiment, but with different scopes. See M.P.E.P. § 806.03. For clarity of this point, Applicant has added reference characters to claims 13 and 20. Applicant also asks the Examiner to compare the features claimed in dependent claim 16 with the features claimed in independent claim 20.

#### **Claim Rejections - 35 U.S.C. § 112**

The Office action rejected claims 13-24 as being indefinite. Specifically, the Office action stated that claims 13 and 20, in addition to claiming the press block, recited features of the terminal. Applicant wishes only to claim features of the press block. To clarify this point, Applicant modified claims 13 and 20 to describe that each opening is "adapted to receive" a respective terminal "so that" the terminals "can" extend through said base; and modified claim 20 to describe a front face "for receiving" the terminals. These phrases, while describing the terminal, clearly do not claim such features. Applicant requests that the Examiner reconsider and withdraw the rejection.

### Claim Rejections - 35 U.S.C. § 102

The Office action rejected claims 13, 17, 19 and 29-32 as being anticipated by the prior art described in the specification (hereinafter prior art). Applicant believes the rejection was improper and must be withdrawn. Specifically, the prior art fails to disclose or to suggest all of the features of the claims.

Independent claims 13 and 29 recite, *inter alia*, a press block with openings “through” the base. The prior art does not disclose such feature. Rather, the prior art discloses fins (5) extending from a base (4). Applicant presumes that the Examiner considers the open area between the fins to be the claimed openings. However, these open areas merely extend towards the base, and do not extend “through” the base as required by the claims. None of the remaining cited references provide a motivation for such a modification.

As described in the specification, the present invention is an improvement from the “open” structure of the prior art. During actuation, the outermost fins of the “open” press block of the prior art tend to deflect outwardly. Such deflection increases the risk that the press block will break.

In distinction, the present invention describes a press block with a “closed” structure. The “closed” structure is defined by a planar base that has a plurality of openings therein, each corresponding to a respective terminal. The “closed” structure provides a more rigid structure, and allows the terminals to extend through the press block.

The Office action rejected claims 13-18, 20-24 and 29-32 as being anticipated by Potters '826. As for the rejection of claims 13, 16-18, 20, 23, 24, 29 and 32, independent claims 13 and 20 recite, *inter alia*, a press block that “removably

engag[es]" the terminals. Potters '826 fails to disclose or to suggest this feature. As seen in Figure 2 of Potters '826, press block (24) is part of header (20).

In distinction, the present invention relates to a press block (35). The press block is part of an application machine, not the connector. As part of an application machine, the press block disengages from the terminals once the terminals have been inserted into the substrate.

In addition to the arguments above, Applicant believes that Potters '826 fails to disclose or to suggest the features of dependent claims 14, 15, 21, 22, 30 and 31.

Claims 14, 21 and 30 recite, *inter alia*, that the press block is made by metal injection molding. Claims 15, 22 and 31 recite, *inter alia*, that the press block is made from a polymer and a fine grain metal.

The Office action broadly interpreted the "polymer" language of Potters '826 to include a metal injection molded component and a composite of a polymer and a fine grain metal. Applicants respectfully disagree. First, the drawings which provide a cross-section of the press block show an insulative material. Second, if the press block were made from a conductive material, then the connector would not function. Since the press block remains part of the connector (*see, e.g.,* Figure 1), the use of a conductive material would short all of the terminals. Clearly, therefore, Potters '826 does not disclose nor suggest a metal injection molded press block, nor a press block made from a composite of a polymer and a fine grain metal. Applicant requests that the Examiner reconsider and withdraw these rejections.

#### **Claim Rejections - 35 U.S.C. § 103**

The Office action rejected claims 14-16, 20-24 and 29-32 as being obvious over the

prior art. As discussed above, the prior art fails to disclose or to suggest all of the features of independent claims 13 and 29. For at least this reason the rejection of dependent claims 14-16 and 30-32 must be withdrawn.

As for the rejection of claims 20-24, independent claim 20 now recites, *inter alia*, that the openings extend “through” the front face of the press block. The prior art does not disclose such a feature. As discussed earlier, the prior art discloses fins (5) extending into base (4), but not “through” the base as required by the claims. None of the remaining cited references overcome the shortcomings of the prior art. Applicant requests that the Examiner reconsider and withdraw the rejection.

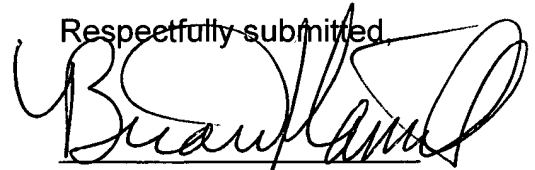
#### **Newly Added Claims**

Applicant added new claims 33-36. The newly added claims define inventions that are patentable over the cited references. Applicant did not introduce new matter to the original disclosure. For example, support for newly added claims 33-35 appears in Figure 7; and support for claim 36 appears in Figure 8.

#### **Conclusion**

In light of the foregoing, Applicant submits that the claims are now in condition for allowance. Applicant requests that the Examiner reconsider and withdraw the rejections. Applicant solicits the allowance of claims 13-24 and 29-36 at an early date.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brian J. Hamilla', is written over a horizontal line.

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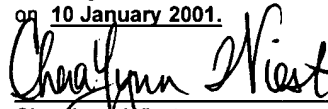
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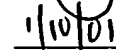
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Cheryl Lynn Wiest



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